

**Patrick B. Donohue, JD, MBA**  
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New York, NY 10026

September 4, 2021

Hon. Stewart D. Aaron  
Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1970  
New York, NY 10007

**Re: USA et al. ex rel. Patrick Donohue 20-cv-5396 (GHW) (SDA)**

Dear Magistrate Judge Aaron:

As Your Honor is aware, the undersigned is the Relator in the above-referenced matter.

By letter motion dated July 6, 2021, [ECF Dkt. #14], the undersigned requested a thirty-five (35) day extension of time to file and serve a Second Amended Complaint in this matter, from August 4, 2021, to September 8, 2021. On July 8, 2021, Your Honor granted the undersigned's request. [ECF Dkt. #15].

In hindsight, the undersigned should have requested a date two weeks, and not two days, after Labor Day to file Relator's Second Amended Complaint.

Relator's Second Amendment Complaint is nearly complete. However, with the usual end-of-summer vacation schedules, staff shortages, preparations for school openings, and the like, as well as the unprecedented storm that we experienced earlier this week, Relator has not been, and will most likely not be, able to finish, file and serve the Second Amended Complaint by September 8, 2021.

The undersigned has reduced the number of Defendants in this matter to fourteen (14) school districts and their respective Superintendents and is in the final stages of reviewing and revising Relator's causes of action against each defendant.

Relator most respectfully requests i) a sixteen (16) day extension from September 8, 2021, to September 24, 2021, **to file** the Second Amended Complaint; ii) thirty-one (31) days thereafter **to serve** the Second Amended Complaint upon the Defendants, and fourteen (14) days thereafter **to file appropriate proof of service with the Court**. Relator's requested extensions are as follows:

- Relator's Second Amended Complaint shall be filed on or before September 24, 2021;
- Relator shall serve the Second Amended Complaint upon Defendants on or before October 25, 2021; and

- Relator shall file appropriate proof of service with the Court via ECF on or before November 8, 2021.

This is Relator's second request for an extension to file and serve a Second Amended Complaint.

The undersigned thanks the Court for its attention and consideration to this matter.

Respectfully submitted,



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Patrick B. Donohue, J.D., MBA  
Relator Pro Se